

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JIMMIE LEWIS,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-1350-GMS
)	
DR. SYLVIA FOSTER, et al.,)	
)	
Defendants.)	

**DEFENDANT LANCE SAGERS'
RESPONSE TO PLAINTIFF'S MOTION FOR DEPOSITION ANSWERS**

1. Lance Sagers what is your specific account of what occurred at the D.P.C. Mitchell Buildings dinning hall on 6/14/04 at or about 8:00 pm; regarding the Plaintiff Jimmie Lewis.

RESPONSE: I have no personal knowledge of the Dining Hall incident on June 14, 2004. I was on a meal break outside of the Mitchell Building from 8:00 p.m. to 8:40 p.m. Beginning at 9:00 p.m., I was involved in a 1:1 supervision of patient T.W. until 10:00 p.m.

2. Lance Sagers who were the D.P.C personnel that escorted the plaintiff to the seclusion room on 6/14/04 at or about 8:00 pm.

RESPONSE: I have no personal knowledge of the escort of Jimmie Lewis to the seclusion room from the Dining Hall following the M&M incident. I was on a meal break outside of the Mitchell Building from 8:00 p.m. to 8:40 p.m. Beginning at 9:00 p.m., I was involved in a 1:1 supervision of patient T.W. until 10:00 p.m.

3. Lance Sagers what is the description of your job duties.

RESPONSE: I am a Nursing Assistant at the Delaware Psychiatric Center. I attend classes concerning facility policies and procedures, nursing, therapeutic support methods, and safety and security. I receive hands-on training by observing and assisting professional and higher level non-professional nursing and therapeutic staff. I monitor and record temperature, pulse, respiration, blood pressure, nutritional intake, and alert professional staff to significant irregularities. I implement prescribed treatment plans involving reality orientation, sensory stimulation, range of motion exercise, and the application of splints and braces. I provide oral and written descriptions of patients' physical and behavioral changes. I observe patients' activities, providing oral and written report of unusual and hazardous behavior. I observe and supervise patients within the

facility and its surroundings to ensure appropriate location and security. I escort patients traveling to social and recreational activities and medical appointments off campus. I participate on the interdisciplinary care team providing information about patients' overall physical condition, abilities, and behavioral characteristics. I apply appropriate interventions to prevent or deescalate inappropriate behaviors. I assist patients with personal hygiene. I maintain patient surroundings ensuring appropriate infection control, sanitary conditions, care, and storage of linens and clothing. I perform additional security related work.

4. Lance Sagers have you ever had to utilize force on a patient at the D.P.C.

RESPONSE: Yes.

5. Lance Sagers while Dr. Foster was employed at the D.P.C. dating 5/21/04 to 6/25/04 did she have the authority to order you to utilize force on a patient.

RESPONSE: Yes.

6. Lance Sagers have you ever filed grievance(s) regarding the description of your job duties at the D.P.C.

RESPONSE: No.

/s/ _____
Lance Sagers

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ _____
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Dated: April 9, 2007